

## REMARKS

Claims 9, 11, 14-16 and 19 are pending in this application. Claims 9, 11, and 14-16 are amended herein. Claims 17 and 18 are cancelled herein without prejudice or disclaimer. Claim 19 is added herein. Support for the amendments to the claims may be found in the claims as originally filed, and at page 15, lines 15-24 of the specification and in Figs. 7 and 8. No new matter has been added. Reconsideration is requested based on the foregoing amendment and the following remarks.

### Response to Arguments:

The Applicants acknowledge with appreciation the consideration given to their arguments filed October 7, 2004.

### Objections to the Claims:

Claims 14, 15, and 16 were objected to for various informalities. Claims 14, 15, 16 were amended in substantial accord with the Examiner's suggestions. The Examiner's suggestions are appreciated. Withdrawal of the objection is earnestly solicited.

### Claim Rejections - 35 U.S.C. § 112:

Claims 17 and 18 were rejected under 35 U.S.C. § 112, second paragraph, as indefinite. Claims 17 and 18 have been cancelled, rendering the rejection moot.

### Claim Rejections - 35 U.S.C. § 102:

Claims 9 and 11-16 were rejected under 35 U.S.C. § 102(e) as anticipated by Price, US 6,389,132 (hereinafter "Price"). The rejection is traversed to the extent it would apply to the claims as amended.

Claim 9 recites,

"a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Price neither teaches, discloses, nor suggests a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user, as recited in claim 9. In Price, rather, as described at column 6, lines 14-17,

(3) Customer A 32 and customer B 34 can interact with the enterprise web presentation. Both the web pages of customer A 32 and customer B 34 can display a "Live voice request button."

Thus, in Price, customer A 32 and customer B 34 are given an enterprise web presentation with which to amuse themselves while waiting for an agent to get to them. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Furthermore, as described at column 6, lines 17-20,

Alternatively, customer A 32 or customer B 34 may initiate a phone call to a call center and subsequently a simultaneous web connection with an agent may be established.

Thus, in Price, customer A 32 and customer B 34 can call the call center on the phone if they get tired of waiting for an agent to get to them, *after* which a web connection might be established. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Furthermore, as described at column 7, lines 41-46,

Customer 42 may also access the enterprise company E-mail address from the enterprise company presentation page. By clicking on the E-mail address, customer 42 can E-mail a question which is queued for agent 30. Agent 30 can respond to the question with E-mail response 48.

Thus, in Price, Customer 42 is given access to the enterprise company E-mail address from the enterprise company presentation page so customer 42 can E-mail a question to agent 30 in the event that they get tired of waiting for an agent to get to them. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Furthermore, as described at column 7, lines 28-34,

FIG. 6 represents another embodiment of the present invention in which agent 30 can multi-task across multimedia conversation types. For example, agent 30 can simultaneously handle a live voice conversation, a live text conversation, and an offline E-mail task.

Thus, in Price, agent 30 can simultaneously handle a live voice conversation, a live text conversation, and an offline E-mail task. This is to be contrasted with claim 9, in which "a

graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Finally, as described at column 7, lines 34-37,

Customer 42 may request E-mail response 48, customer 44 may request voice response 50, and customer 46 may request text response 52. Text response 52 and voice response 50 can be made in the manner as described by FIGS. 2 and 4, respectively.

Figs. 2 and 4 show timelines, not graphical user interfaces. This is to be contrasted with claim 9, in which "a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user."

Claim 9 recites further,

"a processing unit which successively processes the inquiries in a queue on said operator terminal such that said operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Price neither teaches, discloses, nor suggests a processing unit, which successively processes the inquiries in a queue on said operator terminal such that said operator terminal communicates with the client terminal using the communication media, selected when answering the inquiry, as recited in claim 9. Price, rather, has pretty much given up processing inquiries successively, i.e. in the order in which they were received, and seeks to provide a way to reduce the backlog by diverting some of the inquiries to, for example, a specialized agent. In particular, as described at column 2, lines 14-19,

Another technical advantage of the present invention is that customers can be grouped and their requests can be forwarded to a specialized agent or a live event. In this case, a group of customer requests can be serially addressed, thus saving time and money to the web-based call center.

Thus, in Price, customers can be taken out of the queue and grouped and their requests can be forwarded to a specialized agent or a live event. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue on said operator terminal such that said operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Furthermore, as described at column 4, lines 1-6,

(5) Customer 12 can be placed on hold while waiting for an available agent.

(6) Customer 12 can be provided information about the expected hold time, number in the queue of customer contact requests. Customer 12 can be provided the option to schedule an agent connection at a later time.

Thus, in Price, a customer on hold can be coaxed to leave the queue with depressing accounts of interminable wait times. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue on said operator terminal such that said operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Furthermore, as described at column 5, lines 3 and 4,

(4a) Customer A 32 can type a text question and request to be connected to an agent. (4b)

Thus, in Price, a customer on hold can request to be connected with an agent directly, out of order. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue on said operator terminal such that said operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Furthermore, as described at column 5, lines 4 and 5,

(4b) The request can be queued at Contact Server 20 and (4c) routed by Contact Server 20 to agent 30.

Thus, in Price, a request of a customer on hold can be routed to an agent directly, out of order. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue on said operator terminal such that said operator terminal communicates with the client terminal using the communication media selected when answering the inquiry."

Finally, as described at column 5, lines 6-10,

Agent 30 can receive a request notification from Contact Server 20. The request notification may take the form of a visual and audio notice that is displayed on a work station of agent 30. The request may also be a new item in the work tray of agent 30.

Thus, in Price, Agent 30 can receive a request of a customer on hold directly, out of order. This is to be contrasted with claim 9, in which "a processing unit which successively processes the inquiries in a queue on said operator terminal such that said operator terminal

communicates with the client terminal using the communication media selected when answering the inquiry." Claim 9 is submitted to be allowable. Withdrawal of the rejection of claim 9 is earnestly solicited.

Claims 11, 12, and 13 depend from claim 9 and add further distinguishing elements. Claims 11, 12, and 13 are thus also submitted to be allowable. Withdrawal of the rejection of claims 11, 12, and 13 is also earnestly solicited.

Claim 14:

Claim 14 recites,

"the selection and the input being performed by a user using a graphical user interface of said client terminal, the user's selection being made between at least two available communication media choices comprising a telephone and an email."

Price neither teaches, discloses, nor suggests a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user, as discussed above with respect to the rejection of claim 9.

Claim 14 recites further,

"providing a control to successively process the inquiries in the queue on said operator terminal."

Price neither teaches, discloses, nor suggests successively processing the inquiries in a queue on an operator terminal, as discussed above with respect to the rejection of claim 9. Claim 14 is thus submitted to be allowable as well, for at least those reasons discussed above with respect to claim 9. Withdrawal of the rejection of claim 14 is earnestly solicited.

Claim 15:

Claim 15 recites,

"displaying a graphical user interface on said client terminal of the user for selecting a communication media to be used when receiving the answer from said operator terminal and for inputting contents of the inquiry and information related to the user."

Price neither teaches, discloses, nor suggests a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user, as discussed above with

respect to the rejection of claim 9.

Claim 15 recites further,

“providing a control to successively process the inquiries in the queue on said operator terminal.”

Price neither teaches, discloses, nor suggests successively processing the inquiries in a queue on an operator terminal, as discussed above with respect to the rejection of claim 9.

Claim 15 is thus submitted to be allowable as well, for at least those reasons discussed above with respect to claim 9. Withdrawal of the rejection of claim 15 is earnestly solicited.

Claim 16:

Claim 16 recites,

"displaying a graphical user interface on said client terminal of the user for selecting a communication media to be used when receiving the answer from said operator terminal and for inputting contents of the inquiry and information related to the user."

Price neither teaches, discloses, nor suggests a graphical user interface which allows the user to select a communication media to be used when receiving the answer from the operator and to input contents of the inquiry and information related to the user, as discussed above with respect to the rejection of claim 9.

Claim 16 recites further,

“providing a control to successively process the inquiries in a queue on said first operator terminal.”

Price neither teaches, discloses, nor suggests successively processing the inquiries in a queue on an operator terminal, as discussed above with respect to the rejection of claim 9.

Claim 16 is thus submitted to be allowable as well, for at least those reasons discussed above with respect to claim 9. Withdrawal of the rejection of claim 16 is earnestly solicited.

Claim 19:

New claim 19 depends from claim 9 and adds further distinguishing elements. New claim 19 is thus believed to be allowable as well, for at least those reasons discussed above with respect to claim 9.

Conclusion:


Accordingly, in view of the reasons given above, it is submitted that all of claims 9, 11, 14-16 and 19 are allowable over the cited references. Since the objections to the claims were addressed, it is submitted that all of claims 9, 11, 14-16 and 19 are now in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

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